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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

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UNITED STATES OF AMERICA, Plaintiff, v. **Saeid Eshbela Vatankhah,** Defendant	Magistrate Docket No. '08 MJ 0033
	COMPLAINT FOR VIOLATION OF:
	Title 18, U.S.C., Section 1544 Misuse of a Passport

The undersigned complainant, being duly sworn, states:

On or about September 4, 2007, within the Southern District of California, defendant, SAEID ESHBELA VATANKHAH, willfully and knowingly used Greece Passport No. T208087, which passport had been issued and designated for the use of another person, to wit, Mikos Pisolios, in that the defendant presented said passport to United States Customs and Border Protection Officer Reeves at the San Ysidro, California Port of Entry, falsely claiming to be Mikos Pisolios; in violation of Title 18, United States Code, Section 1544, a felony.

And the complainant further states that this complaint is based on the attached statement of facts, which is incorporated herein by reference.

Daniel Hiel
Immigration and Customs Enforcement
Special Agent

SWORN TO BEFORE ME AND SUBSCRIBED IN MY PRESENCE, THIS **4th** DAY OF **January 2008.**

Cathy A. Bencivengo
UNITED STATES MAGISTRATE JUDGE

MJP

CONTINUATION OF COMPLAINT:
Saeid Eshbela Vatankhah

PROBABLE CAUSE STATEMENT

United States Customs and Border Protection Officer Reeves is currently assigned to the San Ysidro, California Port of Entry. In the course of his duties, he reviews and evaluates the validity of documents provided by individuals when making application for entry into the United States.

On or about September 4, 2007, Officer Reeves was working pedestrian primary at the San Ysidro, California Port of Entry when defendant **Saeid Eshbela Vatankhah** presented himself for entry into the United States.

At approximately 1538 hours, Officer Reeves asked **Vatankhah** to declare his country of citizenship. **Vatankhah** stated that he was Greek and he presented a Greek passport (T208087) to Officer Reeves. This Greek passport presented by **Vatankhah** contained his picture and the name Mikos Pisolios, and a date of birth of August 15, 1984. When asked where he was going, **Vatankhah** stated he was going to Disneyland in Anaheim, California. Officer Reeves conducted a check of the passport in the Treasury Enforcement Communications System. This check revealed a positive response for the passport (T208087) as having been reported stolen by the Office of the Greek Counsel General.

Officer Reeves escorted **Vatankhah** to pedestrian secondary where further records checks were conducted. Passport (T208087) was verified as a stolen passport.